

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	)	CHAPTER 13
	)	
	)	CASE NO.: 22-11606-AMC
	)	
RODNEY MARSHALL,	)	
Debtor	)	
~~~~~	)	
ALLY BANK LEASE TRUST,	)	
Movant	)	
vs.	)	<b>HEARING DATE:</b>
	)	Tuesday, April 23, 2024
RODNEY MARSHALL, and	)	11:00 A.M.
REGINA MARSHALL, Codebtor.	)	
Respondent(s)	)	
and	)	
	)	
KENNETH E. WEST	)	<b>LOCATION:</b>
Trustee	)	900 Market Street, Suite 400
	)	Courtroom No. 4
	)	Philadelphia, PA 19107

**MOTION FOR RELIEF FROM AUTOMATIC STAY AND CODEBTOR STAY**

AND NOW, comes the above-captioned Movant, Ally Bank Lease Trust, by and through their attorney, Regina Cohen, who files this Motion based upon the following:

1. The Movant is a corporation having a principal place of business located at 1234 Main, Desoto, TX 75115.
2. The Respondent, Rodney Marshall is an individual with a mailing address at 5408 James Street, Philadelphia, PA 19137, who has filed a Petition on June 21, 2022 under Chapter 13 of the Bankruptcy Code.
3. On or about December 30, 2020, Debtor Rodney Marshall and Co-debtor REGINA MARSHALL entered into a Motor Vehicle Lease Agreement, involving a lease in the amount of \$17,777.76 for the use of a 2021 Jeep Grand Cherokee Utility 4D Limited 4WD 3.6L V6.
4. The vehicle secured by the Contract has V.I.N. 1C4RJFBGXMC506117.
5. Movant is the assignee of the Lease Agreement.

6. The lease obligation is in the amount of \$6,173.53, through March 20, 2024 though subject to change. This amount does not include the Purchase Option of \$26,636.10. Lease matures on June 29, 2024.

7. Applying payments received to the earliest payment due, payments have been missed post-petition, since October 30, 2023 in the amount of \$1,873.09, plus all applicable interest, attorneys' fees and costs. Additionally, there are unpaid repossession charges in the amount of \$0.00, late charges in the amount of \$93.64, and other charges in the amount of \$0.00. The regular monthly payment is \$423.28.

8. The Property has a N.A.D.A. Value of \$31,700.00.

9. The vehicle is not necessary to an effective reorganization.

10. The Movant is the only lienholder of record with regard to the vehicle.

11. Failure to make adequate protection payments is cause for relief from the automatic stay and codebtor stay.

12. The Movant has incurred attorney's fees in the filing of this Motion.

13. The vehicle is a rapidly depreciating asset. Movant requests the waiver of Rule 4001(a)(3).

WHEREFORE, Movant prays for your Honorable Court to enter an Order permitting the Movant to proceed with the repossession proceedings of the aforementioned vehicle.

Respectfully submitted,  
Lavin, Cedrone, Graver, Boyd & DiSipio

/s/ Regina Cohen  
Regina Cohen  
Attorney for Movant  
Suite 500 190 North Independence Mall West 6th &  
Race Streets  
Philadelphia, PA 19106  
(215) 351-7551